

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

LAUREL PARK COMMUNITY, LLC, a  
Washington limited liability company;  
TUMWATER ESTATES INVESTORS, a  
California limited partnership;  
VELKOMMEN MOBILE PARK, LLC, a  
Washington limited liability company; and  
MANUFACTURED HOUSING  
COMMUNITIES OF WASHINGTON, a  
Washington non-profit corporation,

Plaintiffs,

vs.

CITY OF TUMWATER, a municipal  
corporation,

Defendant.

**NO. C09-5312 BHS**

**DECLARATION OF  
WILLIAM PARTIN IN SUPPORT  
OF DEFENDANT CITY OF  
TUMWATER'S MOTION FOR  
SUMMARY JUDGMENT**

PURSUANT TO 28 U.S.C. § 1746, William Partin declares as follows:

I, William Partin, hereby state and declare as follows:

1. I have been retained by counsel for the defendant City of Tumwater in the above entitled matter. I am a Certified Public Accountant and partner in the firm of Mueller & Partin, PLLC in Bellevue, Washington. I consult regularly concerning financial investigations and economic analysis of damages claims. I have frequently consulted regarding claims of economic impact on businesses. I have been admitted as an expert witness on numerous occasions to testify as a CPA and forensic economist to evaluate

**DECLARATION OF WILLIAM PARTIN - 1**

LAW, LYMAN, DANIEL,  
KAMERRER & BOGDANOVICH, P.S.  
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1 claims of economic impact. These claims often involve assessment of impacts on the value  
2 of real estate.

3 2. In response to reports submitted by the plaintiffs from two experts, Jean-  
4 Marie Wilson and Joel Erlitz, I was asked to evaluate whether the mobile home park  
5 ordinances which were the subject of this case had an economic impact on the park owners  
6 or otherwise created a burden on their operation of their property. In response to that  
7 assignment, I prepared a report in conformity with Fed. R. Civ. P. 26(a)(2)(B). Attached  
8 hereto as **Exhibit A** is a true and correct copy of my report and Attachment 1 thereto.  
9 Attachment 1 to my report is my resume which includes my statement of qualification as a  
10 CPA and Forensic Economist. I have not included pages 22 through 25 of my report which  
11 critique the Declaration of Joel Erlitz. I have been informed through counsel that Mr. Erlitz  
12 has been withdrawn as an expert witness in this matter.

13 I make this declaration under penalty of perjury under the laws of the state of  
14 Washington.

15 DATED this 16 day of March, 2010, at Bellevue, Washington.

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18   
19 William Partin